

**Verizon Wireless Response to
Public Service Commission of Wisconsin
Area Code Relief Implementation - Data Request Dated May 16, 2008**

Investigation of Area Code Relief for the 715 Area Code in Northern Wisconsin
Investigation of Area Code Relief for the 920 Area Code

5-TN-100
5-TN-106

Please address any customer education and/or implementation issues that may arise for your company that are specific to the following scenarios:

A. An overlay is selected as the Commission's preferred method of relief in both area codes.

Verizon Wireless Response: As noted in previously filed comments¹, Verizon Wireless strongly recommends an all-services overlay for each NPA because overlays are truly the best and most equitable relief method for consumers. An all-services overlay treats all customers equally and no customers have to change their telephone numbers.

Verizon Wireless does not anticipate any customer education and/or implementation issues if the Commission chooses two overlays for relief of the 715 and 920 NPAs. In fact, Verizon Wireless asserts that two overlays would present the most simple and consistent customer education message across the 715 and 920 NPAs, particularly if the implementations occur within a short timeframe of each other. Verizon Wireless recognizes that an effective customer education plan for the overlays will be needed to inform 715 and 920 consumers about the necessity of 10-digit dialing, but notes that Verizon Wireless has successfully implemented numerous overlays in other states and that customers quickly adapt to the dialing pattern change.

B. An overlay is selected as the Commission's preferred method of relief in one area code while a split is selected for the other area code.

Verizon Wireless Response: Verizon Wireless anticipates some implementation issues associated with any split, regardless of which side retains the old NPA. Products and services offered today are complex; ancillary services and data products, beyond traditional voice services, can be negatively impacted by a split.

If the Commission chooses an overlay for one NPA and a split for the other, Verizon Wireless anticipates a complicated and confusing customer education effort, particularly if the implementations occur within a short timeframe of each other. Consumers and businesses receiving the new NPA in the split are likely to feel discriminated against when forced to change their telephone numbers and endure the associated inconvenience and cost of notifying everyone of their new telephone numbers. There will be stark contrast between the consumers and businesses on the "losing" side of the split that must endure the burdens and associated costs of changing their telephone numbers when compared to the vast majority that won't have to endure such burdens and costs.

¹ See Verizon's "Response to Notice of Investigation" in PSCW Docket No. 5-TN-100 and "Response to Notice of Investigation" in PSCW Docket No. 5-TN-106.

- 1. In the split area code, the section along the current 715/920 boundary is assigned the NEW area code.**

Verizon Wireless Response: Please see response above under B.

- 2. In the split area code, the section along the current 715/920 boundary retains the EXISTING area code.**

Verizon Wireless Response: Please see response above under B.

C. A split is selected as the Commission's preferred method of relief in both area codes.

Verizon Wireless Response: Verizon Wireless anticipates some implementation issues associated with any split, regardless of which side retains the old NPA. Products and services offered today are complex; ancillary services and data products, beyond traditional voice services, can be negatively impacted by a split. For more information on the issues that may be encountered during an NPA split, the Commission may wish to review the Alliance for Telecommunications Industry Solutions' Industry Numbering Committee's (ATIS INC) *NPA Code Relief Planning and Notification Guidelines*, specifically Appendix F.²

If the Commission chooses splits as the method of relief for both NPAs, Verizon Wireless anticipates a complicated and confusing customer education effort, particularly if the implementations occur within a short timeframe of each other and because the NPAs are adjacent to each other. Consumers and businesses receiving the new NPA in each split are likely to feel discriminated against when forced to change their telephone numbers and endure the associated inconvenience and cost of notifying everyone that contacts them of their new telephone numbers. There will be stark contrast between the consumers and businesses on the "losing" side of the split that must endure the burdens and associated costs of changing their telephone numbers when compared to those on the "winning" side that won't have to endure such burdens and costs. Picking such "winners" and "losers" is unnecessary when the Commission has the authority to make all 715 and 920 consumers "winners" by choosing two overlays as the method of relief for the 715 and 920 NPAs.

If the Commission chooses splits as the method of relief for both NPAs, Verizon Wireless anticipates a lengthy and complicated implementation effort as well. Splits are much more labor intensive, requiring telephone number changes in numerous databases and network elements, as well as in billing and other operational support systems.

- 1. Along the current 715/920 boundary, the NEW area code is assigned on each side of the boundary.**

Verizon Wireless Response: Please see response above under C.

- 2. Along the current 715/920 boundary, a NEW area code assigned to one side of the boundary line and the EXISTING area code is retained on the other side.**

Verizon Wireless Response: Please see response above under C.

- 3. Along the current 715/920 boundary, the EXISTING area codes are retained on each side.**

Verizon Wireless Response: Please see response above under C.

² See Document ATIS-0300061 at <http://www.atis.org/inc/incguides.asp>.

D. Miscellaneous.

1. In addressing these issues, please indicate if your company's concerns differ based on whether the 715 or 920 relief effort takes place first.

Verizon Wireless Response: Verizon Wireless has no concerns in whether the 715 or 920 relief effort takes place first, except that relief for a given NPA must occur prior to that NPA's exhaust. Verizon Wireless urges the Commission to make a decision quickly so that the industry has sufficient time to plan, set appropriate implementation dates, and implement relief before the NPA's exhaust.

2. Does your company have any particular concern about having relief efforts for the 715 and 920 area codes happening in such a close timeframe?

Verizon Wireless Response: Verizon Wireless notes that the Commission has the authority to make a decision for both NPAs quickly. In doing so, the Commission will allow the industry sufficient time to plan and implement relief separately before either NPA exhausts.

3. Are there any particular problems that may arise for your company if any of the implementation periods for the 715 area code overlap with the implementation periods for 920?

Verizon Wireless Response: Please see response above under Item D, #2.

4. If so, what implementation steps (if any) should not overlap? Why?

Verizon Wireless Response: Please see response above under Item D, #2.